

1 of 6

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA

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NORTHERN DISTRICT OF ALABAMA  
2007 OCT 13 AM 10:24

DEBRA P. HACKETT, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

NATHANIEL SHAW,

PLAINTIFF,

v.

D. T. MARSHALL, et al,

DEFENDANTS.

CASE NO. 2:07-CV-606-ID

MOTION FOR LEAVE TO FILE AN OBJECTION  
MOTION FOR OBJECTION TO MOTION FOR  
PRODUCTION OF DOCUMENTS DENIAL IN PART

COMES NOW THE PLAINTIFF NATHANIEL SHAW,  
"PRO SE" AND MOVES THIS HONORABLE COURT  
TO RECONSIDER IN PART THE PLAINTIFF  
REQUEST OF DOCUMENTS THAT ARE ESSENTIAL  
EVIDENCE IN POSSESSION OF THE DEFENDANTS.  
THE PLAINTIFF ASSERT THAT THERE ARE MORE  
CONSTITUTIONAL ISSUES BEFORE THIS HONORABLE  
COURT. THE COURT MUST CONSIDER THE PRODUCTION  
OF THE FOLLOWING DOCUMENTS DUE TO THE FACT  
THAT THESE ISSUES OF CONSTITUTIONAL VIOLATION  
ARE THAT OF MEDICAL NEGLIGENCE THEREFORE, IF  
THE DEFENDANTS OF THE MONTGOMERY COUNTY  
JAIL FACILITY MEDICAL DEPARTMENT USE

206

A PORTION OF ITS POLICY TO JUSTIFY THE PLAINTIFF BEING BASICALLY TOTAL BLIND IN HIS LEFT EYE AND YET, TO SEE AN EYE SPECIALIST. IN ALL FAIRNESS AND FOR DISCOVERY SAKE CERTAINLY THE PLAINTIFF IS ENTITLED TO THE FOLLOWING WHICH IS NOT A SAFETY OR SECURITY RISK AND THESE DOCUMENTS ARE ESSENTIAL. BLINDNESS IS OVERLY BURDENSOME ON THE PLAINTIFF.

THE REQUESTED DOCUMENTS ARE AS FOLLOWS:

(I) THE MEDICAL POLICY AND REGULATION FOR INMATES BOOKED INTO THE MONTGOMERY COUNTY DETENTION FACILITY.

(I) THE SCREENING PROCEDURES BY MEDICAL

(II) THE SCREENING PROCEDURES FOR VITAL SIGNS AND MEDICATION UPON INITIAL INTAKE.

2) THE LIST OF COMPLAINTS, MEDICAL EMERGENCIES AND DEATHS ALLEGED FOR LACK OF PROPER MEDICAL SCREENING, PROPER TIMELY MEDICAL VITAL SIGNS AND LACK OF NOTICE BY BOOKING OFFICERS FOR THE LAST PAST TWO (2) YEARS.

THE PLAINTIFF ASSERT THAT THE (SOP) FOR INMATES WHO ARE BOOKED INTO THE MONTGOMERY COUNTY DETENTION FACILITY

THE INFLUENCE OF DEATH

3 OF 6

ALCOHOL ARE ESSENTIAL TO PLAINTIFF FOR SUMMARY JUDGEMENT. THE DEFENDANTS CLAIM THAT PLAINTIFF WAS UNDER THE INFLUENCE OF DRUGS. THE PLAINTIFF ATTEST THAT ANY FACTS CONCERNING DRUG USAGE AND THERE ARE (SOP'S) IN THE POSSESSION OF THE MONTGOMERY DETECTIVE DIVISION AND THE MONTGOMERY COUNTY DETENTION FACILITY DEFENDANTS. THE PLAINTIFF IS ENTITLED TO THESE DOCUMENTS.

THE PLAINTIFF REQUEST THE ASSISTANCE OF THE COURT IN OBTAINING THIS LAST REQUESTED DOCUMENT AND PRAY THAT THIS HONORABLE COURT WILL SHOW NO FAVORITISM OR BIAS. THE SAID DOCUMENT IS IN THE POSSESSION OF THE OFFICE OF THE CLERK OF THE MONTGOMERY COUNTY DISTRICT COURT. THE DOCUMENT REQUESTED BEING THE ENTIRE PRELIMINARY HEARING TRANSCRIPT HEARING OF JUNE 8, 2007 WHERE THE HONORABLE SHARON YATES, ORDERED THE DEFENDANTS TO GET THE PLAINTIFF MEDICAL TREATMENT. THE DOCUMENT SHOULD BE A MATTER OF PUBLIC RECORD AND IF THE COURT SHALL IN ITS PROFOUND WISDOM SEEK TRUTH AND FAIRNESS IN THE CASE AT BAR AND

4 OF 6

SHALL ORDER ITS PRODUCTION AND IF THERE IS A COST THE PLAINTIFF WILL GLADLY PURCHASE IT SO THIS MATTER MIGHT BE RESOLVED AT THE EARLIEST POSSIBLE TIME. THE PLAINTIFF IS TRULY SUFFERING FROM BOTH ENDS OF THIS BATTLE THAT TRUTH MIGHT PREVAIL. THE PLAINTIFF HAVE AN OVER PROTECTIVE FAMILY THAT WILL STAND ON THE SUPREME COURT STEPS OR THE WHITE HOUSE DOOR STEP TO SEE THAT JUSTICE SHALL PREVAIL ON THE ONE SIDE. ON THE OTHER HAND THE DEFENDANTS ARE SUBTLE AND SKILLFULLY APPLYING RETALIATORY MEASURES AGAINST THE PLAINTIFF ON THE OTHER HAND AND BETWEEN THESE TWO EXTREMES THE PLAINTIFF IS BLIND IN HIS LEFT EYE AND UNDER CRUEL AND UNUSUAL PUNISHMENT ON THE OTHER HAND IN THE DISGUISE OF MASS PUNISHMENT. THE PLAINTIFF HUMBLY PRAY THAT THIS HONORABLE COURT WILL GRANT THIS REQUEST FOR THE RECONSIDER PRODUCTION OF THESE NEED DOCUMENTS.

50F6

IT IS SO PRAYED

UNDER THE PENALTY OF PERJURY.

DONE ON THIS DAY 1<sup>st</sup> OF OCTOBER 2007

RESPECTFULLY

s. Nathaniel Shaw

NATHANIEL SHAW

# 89354 MCDF

P.O. BOX 4599

MONTGOMERY, AL.

36/03



6 OF 6

# CERTIFICATE OF SERVICE

CIVIL ACTION NO. 2:07-CV-606-ID

I NATHANIEL SHAW DO HEREBY CERTIFY THAT A TRUE AND CORRECT COPY OF THE FOREGOING HAS BEEN FURNISHED BY VIA U.S. MAIL ON THIS 1<sup>st</sup> DAY OF OCTOBER 2007 (TD:)

(1) CLERK OF UNITED STATES DISTRICT COURT  
P.O. BOX 711 MONTGOMERY ALABAMA  
36101-0711

(2) CONSTANCE C. WALKER ATTORNEY FOR  
D. T. MARSHALL et al. DEFENDANTS  
P.O. BOX 466D  
MONTGOMERY, ALABAMA  
36103-466D

s/ Nathaniel Shaw  
NATHANIEL SHAW  
# 89354 M.C.D.F.  
P.O. BOX 4599  
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